

WRANGELL COOPERATIVE ASSOCIATION

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August 4, 2017

Lieutenant Governor Byron Mallott
Office of Lt. Governor Byron Mallott
3rd Floor, State Capitol
PO Box 110001
Juneau, AK 99811

Re: Wrangell Junkyard Repository Site Concerns

Dear Lieutenant Governor Mallott:

The Wrangell Cooperative Association (WCA) was recently made aware of the intent to construct the Wrangell Junkyard Repository Site with Ecobond-treated, lead contaminated material on Alaska Department of Natural Resources Pit #2, adjacent to NFS 6259 / Pats Creek Road in Wrangell, Alaska. The repository is a joint project with the Department of Environmental Conservation (DEC), the United States Environmental Protection Agency (EPA), and the City and Borough of Wrangell. As the local Tribal government, we were not formally notified of this project or invited to be involved as a stakeholder. In addition, the construction of a lead contaminated repository adjacent to sites currently and traditionally used by Tribal citizens for vital subsistence activities is a cause of much concern for the Tribe. The purpose of this letter is to formally request your assistance in the halt of the construction of the Wrangell Junkyard Repository Site, to open transparent consultation with all stakeholders, and to explore alternative sites for construction of the repository.

As an introduction, the Wrangell Cooperative Association is a federally recognized Tribe incorporated April 30, 1942 under Section 16 of the Indian Reorganization Act of 1934, as amended for Alaska in 1936. WCA serves a membership of 550 Alaska Native and American Indians in Wrangell, Alaska. An eight-member Tribal Council, elected by the WCA membership, serves as the governing body. The WCA's mission is to support the cultural, ceremonial, and subsistence lifestyle for all Alaskans, and to promote the safe use and availability of a healthy environment for present and future generations.

In the report titled *90% Work Plan and Conceptual Design Wrangell Junkyard Repository Site, Wrangell Alaska TD: 17-01-0015*, it is stated that the EPA, other agencies, and stakeholders conducted a site visit in August 2016 for the Wrangell Junkyard Repository Site. As a stakeholder, WCA was not notified of the repository project, invited to participate in this site visit, or collaborate on alternative options.

On July 27, 2017, Robert Dalrymple, Wrangell District Ranger with the United States Forest Service (USFS), received notification of intent to begin construction of the monofill on July 31, 2017, after Mr. Dalrymple expressed concern to the United States Environmental Protection Agency (EPA) regarding potential impact to adjacent USFS lands. Mr. Dalrymple stated in his letter to the EPA that the work plan and report for the repository “did not mention the anadromous fish streams, including Pats Creek, just below the repository site or a discussion of the effects the lead repository could have on those streams or the people who use them. Pats Creek flows into Pats Lake and both support subsistence and sport fisheries. Pats Lake is a popular place for Wrangell families to swim, boat, and fish”. Until receiving notification of intent to begin construction, Mr. Dalrymple’s office had not been formally notified of the project or invited to be involved as a stakeholder, although transport of the lead contaminated material would occur in an estimated 1,875 dump truck loads over USFS roads, and permanent storage would be adjacent to USFS lands.

Mr. Dalrymple’s concerns mirror those of WCA. According to the July 7, 2017 letter, written by Kristin Ryan, Director of the Department of Environmental Conservation (DEC), “lead is still present in the material that qualify it as polluted soil under State regulation. If consumed by humans, plants, or animals, the lead may have some bioavailability that is potentially toxic”. The land adjacent to the repository site is pristine environment, used extensively by Tribal members for subsistence activities, including hunting, fishing, berry and medicinal gathering; wood gathering; and recreational activities. The Tribe has a historic connection to this land tracing back through the generations. Tribal citizens also practice subsistence activities along the route the lead contaminated material will travel before reaching the repository.

On August 3, 2017, Sally Schlichting, Unit Manager for Technical Services, Policy & Regulations with the DEC, and her colleagues met with WCA. This meeting was the first contact from the State of Alaska DEC on the project. The WCA Board and Tribal members expressed concern regarding lead contaminated material 0.1 miles from Pats Creek, an anadromous fish stream, and one mile from Pats Lake. It was conveyed to Ms. Schlichting that this area is precious to Tribal members, it is a traditional subsistence area, and the Tribe would like to be involved in collaboration regarding alternate options for disposal of the lead contaminated material. Ms. Schlichting continued to assert the lead contaminated monofill would be safe, due to construction and the Ecobond process. No resolution was reached. The DEC hopes to begin construction in late August.

A meeting is scheduled for August 21, 2017 at the City and Borough of Wrangell City Council chambers. This is the first public meeting on the Wrangell Junkyard Repository Site. Until Tribal members were alerted of the project, the majority of the Wrangell community was unaware of the proposed monofill.

The WCA, in keeping with its mission to support the cultural, subsistence and ceremonial lifestyle of all Alaskans, and to promote the availability of a healthy environment for present and future generations, respectfully requests your assistance with the halt of the construction of the Wrangell Junkyard Repository Site. The Tribe respectfully requests that involved stakeholders be made aware of the project and the history of the project planning. Lastly, the Tribe respectfully requests that all stakeholders be allowed to collaborate to discuss an alternate location, other than a traditional Tribal subsistence area, for permanently housing the lead contaminated material from the Wrangell Junkyard.

As an Alaska Native, you share our values of respect and the importance of stewardship of our land. We have been stewards of the land for generations, and will continue this stewardship for generations to come. We appreciate your service to the State of Alaska and your consideration of our request.

I may be contacted at (907) 874-4304 or at wcatribes@gmail.com. We appreciate your timely assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Oliver".

Richard Oliver
Tribal President
Wrangell Cooperative Association